

REMARKS

Claims 1-29 are now pending in the application. Claims 1, 18, and 22 have been amended. Support for the foregoing amendments can be found throughout the specification, drawings, and claims as originally filed. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

REJECTION UNDER 35 U.S.C. § 103

Claims 1-7, 12-19, and 22-29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Taylor ("SSML: A Speech Synthesis Markup Language" Speech Communication, 1996) in view of Henton (U.S. Pat. No. 5,860,064).

Claims 8-11, 20 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Taylor ("SSML: A Speech Synthesis Markup Language" Speech Communication, 1996) in view of Henton (U.S. Pat. No. 5,860,064) and in further view of Kobal (U.S. Pat. No. 7,099,828). These rejections are respectfully traversed.

Applicant has amended claims 1, 18, and 22 to more clearly point out the claimed subject matter. Claim 1 is directed to (a) a text-to-speech engine that converts text-input into segments and word-boundaries associated with speech features and (b) a visual editing interface displaying the segments and word-boundaries.

Claim 1 further calls for that "said visual editing interface displays and allows editing of said at least one speech feature of said word-boundary by editing (a) a first displayed boundary and (b) spacing between a displayed segment and said first

displayed boundary.” Applicant submits that Taylor and Henton, individually or in combination, fail to teach or suggest these limitations.

Taylor at best appears to disclose using a tag <phrase> to indicate degree or level of phrasing, which may include international phrase boundary. The Examiner acknowledges that Taylor does not disclose a visual editing interface for displaying and editing phrase boundaries.

Applicant further submits that Henton fails to cure the deficiencies of Taylor. Henton at best appears to disclose a text-to-speech system that adjusts speech features of word segments by changing dimension or color of the displayed text of the word segments. Henton, however, is not concerned with word-boundaries and consequently does not address how to display and edit word boundaries, including using “a displayed boundary”.

The Examiner asserts that one of ordinary skill in the art can rely upon Henton to arrive at the claimed invention. Applicant respectfully disagrees with the Examiner’s assertion.

The Supreme Court requires, in situations like the present case, the prior art to be capable of providing a predictable solution or variation upon which one of ordinary skill in the art can rely to arrive at the claimed invention. KSR International Co. v. Teleflex Inc., 82 USPQ2d 1385 (2007). Applicant submits that Henton cannot provide a predictable solution or variation for displaying and editing word-boundaries. Speech features of word segments and word-boundaries have inherent differences. For example, speech features of word segments include pitch range, speech rate, and volume, while speech features of word boundaries include prosodic boundary strength.

Increasing and decreasing boundary strength can be visualized as thinner or thicker vertical bar. Variations in word-boundaries also change liaison—where the pronunciation of two words (at their boundary) may change depending whether they are coupled tightly or loosely; allophones can be eliminated and two words can become one. Word-boundaries may also affect prosody.

Because those inherent difference, the techniques taught by Henton for editing word segments can not be predictably applied to editing word-boundaries. One of ordinary skill in the art cannot obtain a visual editing tool for editing word-boundaries based on the teaching of Henton, because the tool of Henton is incapable of editing word-boundaries including liaison. The key to supporting any rejection under 35 U.S.C. §103 is the clear articulation of the reasons why the claimed invention would have been obvious. For at least the reasons set forth above, Applicant respectfully submits that the Examiner has failed to establish a prima facie case of obviousness as required by *Graham v. John Deere Co.*, 148 USPQ 459 (1966). Accordingly, applicants respectfully request the Examiner to reconsider and withdraw this rejection.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested.

If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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